

**IN THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE C.R. BARD, INC.,
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION** **MDL No. 2187**

**IN RE AMERICAN MEDICAL SYSTEMS,
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION** **MDL No. 2325**

**IN RE BOSTON SCIENTIFIC CORP.,
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION** **MDL No. 2326**

**IN RE ETHICON, INC.,
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION** **MDL No. 2327**

**IN RE COLOPLAST CORP.,
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION** **MDL No. 2387**

**IN RE COOK MEDICAL, INC.,
PELVIC REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION** **MDL No. 2440**

THIS DOCUMENT RELATES TO ALL CASES

MOTION FOR SUBSTITUTION AND WITHDRAWAL OF COUNSEL

TO THE HONORABLE JUDGE OF THIS COURT:

PLEASE TAKE NOTICE that Waters & Kraus, LLP (“W&K”), by and through its undersigned counsel, respectfully moves this Court for entry of an order withdrawing **Kyla G. Cole, the current counsel for clients in the above-referenced matter, and substituting Kyla**

G. Cole with Attorney Leslie C. MacLean as Counsel in MDL Nos. 2187, 2325, 2326, 2327, 2387, and 2440.

Accordingly, W&K respectfully requests that the Court enter an order withdrawing Kyla G. Cole as counsel and substituting Leslie C. MacLean as counsel, as well as updating each member case in which any of the named attorneys have been associated in MDL Nos. 2187, 2325, 2326, 2327 and 2440.

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AND

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CERTIFICATE OF SERVICE

I, undersigned counsel for Plaintiffs, hereby certify that on this 22nd day of December, 2015, a true and correct copy of the foregoing document was electronically filed with the Court and served through the CM-ECF system to All Counsel of Record Via Electronic Case Filing procedures and email.

/s/ Kyla G. Cole
Kyla Gail Cole